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**From:** Ramanauskas, Peter [ramanauskas.peter@epa.gov]  
**Sent:** 8/16/2017 5:04:04 PM  
**To:** Star, David [star.david@epa.gov]; Zolnierczyk, Kenneth [zolnierczyk.kenneth@epa.gov]; Steketee, John [steketee.john@epa.gov]  
**Subject:** FW: (Investigations/Other - FY17-159985-3800-CV) Referred to Region - Wisconsin

Gentlemen,

I received the email below from OECA. Shall we forward to WDNR (and perhaps our Air Division) for response to the Madison resident?

Peter

**From:** howard.donna@epa.gov [mailto:howard.donna@epa.gov]  
**Sent:** Wednesday, August 16, 2017 11:52 AM  
**To:** Ramanauskas, Peter <ramanauskas.peter@epa.gov>  
**Subject:** FWD: (Investigations/Other - FY17-159985-3800-CV) Referred to Region - Wisconsin

08/16/2017

SUBJECT: FWD: (Investigations/Other - FY17-159985-3800-CV) Referred to Region - Wisconsin  
FROM: [howard.donna@epa.gov](mailto:howard.donna@epa.gov)  
TO: [Ramanauskas.Peter@epa.gov](mailto:Ramanauskas.Peter@epa.gov)  
CC:

-----Original Message-----

8/7/2017 5:20 PM

HQ LEAD NUMBER: FY17-159985-3800-CV

SUBJECT: Referred to Region - Wisconsin

FROM: [sklafka@wingraengineering.com](mailto:sklafka@wingraengineering.com)

TO:

Name: Steven Klafka

Address: 303 South Paterson Street

City: Madison

State: Wisconsin

Zip: 53703

Phone: 6082555030

Alleged Violator's Name: Madison-Kipp Corporation

Alleged Violator's Address: 201 Waubesa Street

Alleged Violator's City: Madison

Alleged Violator's State: Wisconsin

Alleged Violator's Zip: 53704

Tip or Complaint: At the request of USEPA Region 5, indoor air sampling for polychlorinated biphenyls (PCBs) was conducted within the manufacturing portion of the Madison-Kipp facility in 2015. This sampling was part of the investigation of PCB contamination beneath and throughout the Madison-Kipp property. In the April 21, 2015 summary report of indoor air sampling, the maximum workplace concentration was measured at 0.0841 ug/m<sup>3</sup>. The workplace interior is exhausted to the ambient air through an extensive ventilation system. The last evaluation by the Wisconsin DNR documenting the capacity of the ventilation system shows the total exhaust flow from the manufacturing building is 62.7 cubic meters per second or 133,343 acfm. Based on the measured PCB concentration and exhaust flow rate, the PCB emission rate from the manufacturing building is 0.37 lbs/yr. PCB emissions are greater than the 0.01 lbs/yr threshold under NR 407, Wis. Adm. Code, at which they should be incorporated into the facility air pollution control operating permit; 0.05 lbs/yr threshold under NR 438, Wis. Adm. Code, at which they should be reported in the annual emissions inventory report; and, 0.1 lbs/yr threshold under Chapter NR 445, Wis. Adm. Code, at which they must be controlled using Best Available Control Technology or BACT. On May 18, 2017, Madison-Kipp certified its annual emissions inventory report for 2016. No PCB emissions were reported to the Wisconsin DNR. No application has been submitted to the Wisconsin DNR to incorporate PCB emissions into the facility operation permit. No evaluation has been submitted to the Wisconsin DNR verifying the PCB emissions comply with state BACT requirement. The PCB contamination beneath and throughout the Madison-Kipp facility has not been removed and is expected to be left in place, so the discharge of PCB emissions from the ventilation system is expected to continue with continued violation of the state rules controlling PCB emissions.

Violation Still Occurring? Yes

State DEP/DEQ/DEM Notified? No